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8 IN THE UNITED STATES DISTRICT COURT

9 EASTERN DISTRICT OF CALIFORNIA

10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$40,000.00 IN
U.S. CURRENCY,

15 Defendant.

2:21-MC-00044-TLN-CKD

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

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17 It is hereby stipulated by and between the United States of America and potential claimant Karen
18 DeGuzman (“claimant”), by and through their respective counsel, as follows:

19 1. On or about November 24, 2020, claimant filed a claim in the administrative forfeiture
20 proceeding with the Federal Bureau of Investigation (“FBI”) with respect to the Approximately \$40,000.00
21 in U.S. Currency (hereafter “defendant currency”), which was seized on September 15, 2020.

22 2. The FBI has sent the written notice of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A)
23 to all known interested parties. The time has expired for any person to file a claim to the defendant currency
24 under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a claim to the defendant
25 currency as required by law in the administrative forfeiture proceeding.

26 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
27 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency
28 is subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture

1 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.
2 That deadline was February 22, 2021.

3 4. By Stipulation and Order filed February 23, 2021, the parties stipulated to extend to
4 March 22, 2021, the time in which the United States is required to file a civil complaint for forfeiture
5 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
6 subject to forfeiture.

7 5. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to April
8 22, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
9 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
10 forfeiture.

11 6. Accordingly, the parties agree that the deadline by which the United States shall be required
12 to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that
13 the defendant currency is subject to forfeiture shall be extended to April 22, 2021.

14 Dated: 03/22/21

PHILLIP A. TALBERT
Acting United States Attorney

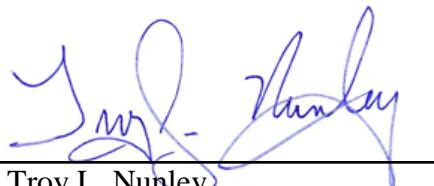
16 By: /s/ Kevin C. Khasigian
17 KEVIN C. KHASIGIAN
18 Assistant United States Attorney

19 Dated: 03/22/21

20 /s/ Justin L. Ward
21 JUSTIN L. WARD
22 Attorney for potential claimant
23 Karen DeGuzman
24 (Signature authorized by phone)

25 **IT IS SO ORDERED.**

26 Dated: March 22, 2021



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Troy L. Nunley
United States District Judge